

UNITED STATES DISTRICT COURT
DISTRICT OF MARYLAND
Northern Division

FILED
U.S. DISTRICT COURT
DISTRICT OF MARYLAND

2013 JAN 18 AM 10:23

CLERK'S OFFICE
AT BALTIMORE

BY  CLERK

UNITED STATES OF AMERICA,

Plaintiff,

- against -

Civil No. **JFM 13 CV 0202**

\$15,753 in U.S. Currency seized from
2023 York Road on August 22, 2012.
Defendant.

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VERIFIED COMPLAINT FOR FORFEITURE

Plaintiff, United States of America, by its attorneys, Rod Rosenstein, United States Attorney for the District of Maryland, and Richard C. Kay, Assistant United States Attorney, brings this complaint and alleges as follows in accordance with Supplemental Rule G(2) of the Federal Rules of Civil Procedure:

NATURE OF THE ACTION

1. This is a civil forfeiture action against U.S. currency that is the proceeds of coercion and enticement to travel interstate to engage in criminal sexual activity, and transportation of an individual interstate to engage in criminal sexual activity, in violation of 18 U.S.C. sections 2421 and 2422.

THE DEFENDANT IN REM

2. The defendant is \$15,753 in U.S. Currency seized from 2023 York Road, Timonium, Maryland 21093 on August 22, 2012 (hereinafter, the "Defendant Currency").

3. The seizure of the Defendant Currency subsequently was adopted by United States Customs and Border Protection (CBP). The Defendant Currency is presently in the custody of CBP in Maryland.

JURISDICTION AND VENUE

4. Plaintiff brings this action *in rem* in its own right to forfeit and condemn the Defendant Currency. This Court has jurisdiction over an action commenced by the United States under 28 U.S.C. § 1345, over an action for forfeiture under 28 U.S.C. § 1355(a), and over this particular action under 18 U.S.C. §§ 981 and 2428.

5. This Court has *in rem* jurisdiction over the Defendant Currency under 28 U.S.C. § 1355(b).

6. Venue is proper in this district pursuant to 28 U.S.C. §1355(b)(1), because the acts or omissions giving rise to the forfeiture occurred in this district and pursuant to 28 U.S.C. § 1395 because the property is located in this district.

BASIS FOR FORFEITURE

7. The Defendant Currency is subject to forfeiture pursuant to 18 U.S.C. § 2428 and 981 because it constitutes and is derived from proceeds traceable to a violation of 18 U.S.C. § 2421 and 2422.

FACTS

8. The forfeiture is based upon, but not limited to, the evidence outlined in the attached Affidavit of Baltimore County Police Detectives Blackburn and Manz, which is incorporated herein by reference.

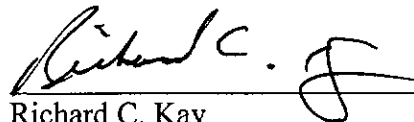
WHEREFORE, plaintiff, the United States of America, prays that all persons who reasonably appear to be potential claimants with interests in the Defendant Currency be cited to appear herein and answer the Complaint; that the Defendant Currency be forfeited and condemned to the United States of America; that upon Final Decree of Forfeiture, the Department of Homeland Security dispose of the Defendant Currency according to law; and that the plaintiff have such other and further relief as this Court deems proper and just.

Dated: January 17, 2013.

Respectfully submitted,

Rod J. Rosenstein
UNITED STATES ATTORNEY
District of Maryland

By:

A handwritten signature in black ink, appearing to read "Richard C. Kay", with a stylized flourish at the end.

Richard C. Kay
Assistant U.S. Attorney
36 South Charles Street
Fourth Floor
Baltimore, MD 21201
410 209-4800

VERIFICATION

I, Richard C. Kay, declare under penalty of perjury as provided by 28 U.S.C. § 1746, that the foregoing Complaint for Forfeiture *in rem* is based on reports and information furnished to me by the Baltimore County Police Department, and that everything contained therein is true and correct to the best of my knowledge and belief.

A handwritten signature in black ink, appearing to read "Richard C. Kay", written over a horizontal line.

Richard C. Kay, Esq.
Assistant U.S. Attorney
United States Attorney's Office
District of Maryland